

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, *ex rel.*)
DILBAGH SINGH, M.D., PAUL KIRSCH, M.D.,)
V. RAO NADELLA, M.D., and)
MARTIN JACOBS, M.D.,)
))
Plaintiffs,) CIVIL ACTION NO. 04-186-E)
))
v.) JUDGE COHILL)
))
))
BRADFORD REGIONAL MEDICAL CENTER,)
et al.,)
))
Defendants.)
)

**JOINT REPORT ON MEDIATION AND REQUEST TO LIFT STAY OF
PROCEEDINGS**

1. Fact discovery in this case ended on September 4, 2007. At that time there were various discovery related disputes pending before the Court.

2. In its Order dated September 12, 2007, the Court noted that even though the parties had not filed a motion to extend fact discovery such an extension might be needed based upon the Court's ruling on the outstanding discovery disputes. The Court ordered all counsel to appear for a hearing on October 2, 2007, prepared to address the discovery issues and to potentially set a new discovery deadline.

3. On September 13, 2007 the Plaintiffs-Relators and Defendants jointly filed a motion requesting that the Court temporarily stay all proceedings in this case to allow the parties to mediate the case to attempt to resolve the case by settlement.

4. This Court issued an Order on September 13, 2007 staying all proceedings including all pending deadlines for the filing of pleadings, all pending deadlines under the Court's Amended Case Management Order dated May 23, 2007, and all scheduled hearings and status conferences. The order also directed the parties to report to the court after the conclusion of the mediation.

5. A mediation was conducted in Pittsburgh on December 4th, 2007 which was attended by all the parties. After a full day of mediation, as well as the subsequent exchange of additional information, the parties have not been able to reach a resolution by settlement at this time.

6. Accordingly, the parties respectfully request that the temporary stay be lifted and that the case proceed, including, resolution of the outstanding discovery disputes and the subsequent entry of a revised scheduling order.

This 21st day of December, 2007.

Respectfully submitted,

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